

### Remarks

The applicants appreciate Examiner Shah's thorough examination of the prior art. However, the applicants respectfully traverse the Examiner's May 23, 2005 office action because the Hung reference (U.S. Patent Application No. 2003/0088527) fails to teach at least one element of each independent claim. Accordingly, applicants respectfully request that the Examiner's rejection under 35 U.S.C. 102(e) be withdrawn.

More specifically, the Hung reference is directed to a system for collecting data representing water use, and displaying that data. Hung does not teach "automatically creating and displaying a water balance for the facility based on the annual water consumption for each of the water consuming operations" as independent claims 1 and 12 recite. Figure 9 of the Hung reference merely displays numerical data including current and predicted future usage statistics. Hung does not automatically create and display a "water balance" as the independent claims recite.

One embodiment of a water balance is depicted in Figure 11 of the present application. The water balance is a graphical illustration of water consumption for a facility (or facilities), including an interrelationship between multiple tiers of water consumption sources. This arrangement helps the person responsible for water management at the facility to more comprehensively understand how, and where, water is being consumed. Hung does not teach a system for creating and displaying a water balance. At best, Hung gathers water usage data within a facility, processes the data into total figures, and outputs those figures in a conventional numerical format, as depicted in Figure 9.


Because Hung does not teach every element of independent claims 1 and 12, the applicants respectfully request that the Examiner's rejection of claims 1-23 under 35 U.S.C. 102(e) be withdrawn.

Applicants have made a genuine effort to respond to the Examiner's objections and rejections in advancing the prosecution of this case. Applicants believe all formal and substantive requirements for patentability have been met and that this case is in condition for allowance, which action is respectfully requested.

No additional fee is believed to be due as the result of the filing of this paper. However, any additional fees or credits should be applied to Deposit Account 06-1510 (Ford Global Technologies, Inc.) as authorized by the original transmittal letter in this case.

Respectfully submitted,

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